



SHERWIN-WILLIAMS.

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THE SHERWIN-WILLIAMS COMPANY
Environmental, Health & Regulatory Services
101 Prospect Avenue NW
Cleveland, Ohio 44115-1075
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September 7, 2007

Bonnie L. Hriczko, On-Scene Coordinator
United States Environmental Protection Agency
Region II - Removal Action Branch
2890 Woodbridge Avenue, Bldg. 209, MS-211
Edison, NJ 08837-3679

RE: Hilliard Creek Site, Gibbsboro, New Jersey
Administrative Order on Consent (AOC):
Index No. II CERCLA-02-99-2037
Final Report

Dear Ms. Hriczko:

As a follow-up to our June 27, 2007 meeting held at your office, and in response to your July 20, 2007 correspondence regarding the Final Report for the above-referenced Hilliard Creek Site, The Sherwin-Williams Company (Sherwin-Williams) is providing the necessary closeout documentation for this Administrative Order on Consent (AOC).

As listed in the AOC under section VI. Order, section 33, paragraph E. Final Report, the following information shall be included:

1. A synopsis of all work performed under this Order;
2. A detailed description of all EPA-approved modifications to the Sampling Plan and/or Work Plan which occurred during Respondent's performance of the work required under this Order;
3. A presentation of the analytical results of all sampling and analyses performed;
4. A good faith estimate of total costs or a statement of actual costs incurred in complying with the Order;
5. A listing of quantities and types of materials removed off site or handled on site;
6. A discussion of removal and disposal options considered for those materials;
7. A listing of the ultimate destination of those materials; and

8. Accompanying appendices containing all relevant documentation generated during the removal action (e.g., manifests, invoices, bills, contracts, permits).

Objective of the Removal Action

The objective of the removal action referenced in the AOC was to limit public access in order to reduce the threat of direct contact from contaminated sediments in the stream and soils adjacent to the stream. The work to be performed was limited to the areas south and west of Clementon Road. The scope of work was as follows:

- Conduct additional sampling, if necessary, to delineate the accessible areas needing restriction, where the potential for direct contact with lead contamination in soils and sediments in excess of 400 ppm exists;
- Install fencing or implement an alternate method to prevent direct contact with lead contaminated soils/sediments above 400 ppm in accessible areas;
- Investigate property ownerships at the site in order to obtain access to all areas that may need access control measures;
- Determine the areas along Hilliard Creek beyond Hilliards Road that have soils/sediments contaminated with lead above 400 ppm and implement access restrictions, if necessary;
- Post warning signs along the fencing where appropriate, as determined by EPA and maintain them; and
- Conduct site inspections on a quarterly basis and assess if additional direct access control measures need to be taken and undertake them, if necessary. Maintain existing control measures if needed.

Work Plans and Reports

Various work plans and reports have been submitted to the Removal Action Branch during the course of the activities performed in response to the AOC. These documents contain all the relevant supporting information and documentation discussed above in items 1 through 8 including the scope of work and any modifications, laboratory analytical results, removal options, disposal manifests with the quantity and ultimate destination of the removed materials, as applicable.

All of the sampling events were conducted in accordance with Work Plan Addenda approved by the United States Environmental Protection Agency (USEPA). All of these addenda supplement the November 1999 "Work Plan for the Hilliard Creek Site, Gibbsboro, New Jersey" (Work Plan). The November 1999 Work Plan, and subsequent Work Plan Addenda, have been approved by the USEPA and are the guiding documents

for conducting investigations at the Hilliard Creek site pursuant to the Administrative Order on Consent (AOC) Index No. II CERCLA-02-99-2037, between Sherwin-Williams and USEPA.

List of Work Plans

Work Plan for the Hilliard Creek Site
Gibbsboro, New Jersey
Administrative Order on Consent for Removal Action
Index No. II CERCLA-02-99-2037
Dated November 1999

Final Work Plan Addendum for the Hilliard Creek Site
Gibbsboro, New Jersey
Administrative Order on Consent for Removal Action
Index No. II CERCLA-02-99-2037
Dated August 2001

Work Plan Addendum III for the Hilliard Creek Site
Gibbsboro, New Jersey
Administrative Order on Consent for Removal Action
Index No. II CERCLA-02-99-2037
Dated March 2002

Work Plan Addendum IV for the Hilliard Creek Site
Gibbsboro, New Jersey
Administrative Order on Consent for Removal Action
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Dated July 2003

Work Plan Addendum V for the Hilliard Creek Site
Gibbsboro, New Jersey
Administrative Order on Consent for Removal Action
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Dated November 2003

Work Plan for the 165 Kirkwood Road Remediation Activities
Gibbsboro, New Jersey
Administrative Order on Consent for Removal Action
Index No. II CERCLA-02-99-2037
Dated August 2003

List of Reports

*Removal Action Report
Hilliard Creek Site - Gibbsboro, New Jersey
Administrative Order on Consent for Removal Action
Index No. II CERCLA-02-99-2037
Dated May 2002*

*Removal Action Addendum Report
Kirkwood Lake – Hilliard Creek Site
Dated March 2003*

*Removal Action Addendum Report
Kirkwood Lake Sampling Program – Hilliard Creek Site
Dated June 2007*

*165 Kirkwood Road Removal Action Report
Hilliard Creek Removal Action
Administrative Order on Consent for Removal Action
Index No. II CERCLA-02-99-2037
Dated October 2003*

Project Costs

A good faith estimate of the total costs incurred in complying with this removal action is estimated at \$ 1,432,773. A cost breakdown on a yearly basis (1999 to 2004 time period) is provided:

Should you have any questions or comments regarding any of the contents of this report or to discuss scheduling a meeting, please do not hesitate to contact me at 216-566-1794 or via e-mail at mlcapichioni@sherwin.com.

Certification

"I certify to the best of my knowledge that the information contained in and accompanying this certification is true, accurate and complete."

Sincerely,



Mary Lou Capichioni
Director, Remediation Services

cc: C. Howard, Esq. (USEPA)
R. Klimcsak (USEPA)
J.Doyon (NJDEP)

Hilliard Creek Site, Gibbsboro, New Jersey
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| COST BREAKDOWN | | | | | | |
|--------------------------------|--------|---------|--------|---------|---------|--------|
| Description | 1999 | 2000 | 2001 | 2002 | 2003 | 2004 |
| Investigation Costs | 77,472 | 458,305 | 43,344 | 119,874 | 71,611 | 48,403 |
| Laboratory Analytical Services | | 108,977 | 13,592 | 78,607 | 11,770 | 9,165 |
| Drilling Services | | 17,774 | 4,840 | 11,039 | | |
| Removal Costs | | | | | 314,000 | |
| Restoration Services | | | | | 44,000 | |
| Total | 77,472 | 585,056 | 61,776 | 209,520 | 441,381 | 57,568 |
| Total Costs = \$1,432,773 | | | | | | |

Note: Investigation costs include work plan preparation, field and sampling activities, delineation activities, measures to limit access such as sign and fence installation, and report preparation and submission.